

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA RECEIVED
DIVISION

Calvin Scott, Sr.
(Blind Vendor)

Plaintiff(s),

v.
Ray Dennis, Perry Hopper, Ken Green
State of Alabama Dept. of Rehabilitation Services
Business Enterprise Program
Defendant(s)

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DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA.

CIVIL ACTION NO.

2:05CV652-F

DEMAND FOR JURY TRIAL

COMPLAINT

1. Plaintiff(s) address and telephone number: 1416 Marler Rd
Pike Road, Alabama 36064
(334) 272-2657
2. Name and address of defendant(s): Ray Dennis, Perry Hopper, Ken Green.
C/O Ray Dennis
Alabama Dept. of Rehabilitation Services(ADRS)
2129 East South Blvd
Montgomery, Alabama 36111-0586
3. Place of alleged violation of civil rights: 50 Monroe St
Gordon Person's Office Building
Montgomery, Alabama 36104
4. Date of alleged violation of civil rights: Jan. 31, 2005; Feb. 9th, 14th, 22nd 2005

State the facts on which you base your allegation that your constitutional rights have been violated:

On the dates listed, the above defendant(s) violated my constitutional rights for equal employment access when they denied me the same access as all other non-handicapped workers to my assigned work area(s), denied me reasonable accommodations as I requested per both state and federal ADA Title I, II, and 504 laws. Then the defendant(s) conspired/corroborated with others defame my character, ruin my good reputation, and take away my right for equal employment and my ability to be self sufficient to provide for myself and my family. Their corroborated actions of defamation of character, slander, libel, intimidation, harassment, threats to my livelihood, and their rush to judgement immediately cost me my job. With me being elderly and totally blind their actions caused me to be emotionally damaged and distressed to say the least. They also violated Alabama State Codes listed in §§ 21-1-40 and 21-9-9; 20 U. S. C. § 107 et. Seq and 795-7-12-.01, 795-7-12-.02, 795-7-12-.03, and 795-7-12-.04 as listed in the State of Alabama Business Enterprise Program.

5. **Relief requested:** I am asking the court to award me a total monetary judgement of \$1,000,000.00 (one million dollars) in punitive damages and imprisonment for the defendant(s) in the county jail, or sentenced to hard labor for the county, not exceeding six months, one or both, at the discretion of the jury per Alabama State Code §13-6-203, and that the defendants pay all court costs associated with this suit. I am also requesting for the defendants to asked to resign from their appointed offices for their breach of oath of office. The Directors and officers of ADRS are supposed to be advocates for the Blind and Handicapped, but these defendants are the State of Alabama Handicapped Citizens greatest adversaries.

July 14, 2005
Date

Calvin Scott Jr
Plaintiff(s) Signature

1416 Marler Rd
Pike Road, Alabama 36064
Address, City, State Zip Code

(334) 272-2657
Telephone Number